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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 PEGGY BANKS, individually and on behalf of
14 all others similarly situated,

15 Case No. 4:24-cv-07877-JST

16 (Hon. Jon S. Tigar)

17 **JOINT CASE MANAGEMENT
18 STATEMENT**

19 Action Filed: Nov. 11, 2024

20 SUNRUN INC.

21 Defendant.

1 Counsel for Plaintiff Peggy Banks (“Plaintiff”) and counsel for Defendant Sunrun Inc.
 2 (“Sunrun”) hereby respectfully submit this Joint Case Management Statement pursuant to this
 3 Court’s Scheduling Order, dated May 7, 2025. Dkt. No. 34.

4 **I. Status of The Parties’ Discovery**

5 **A. Discovery Propounded By Plaintiff**

6 On January 28, 2025, Plaintiff served interrogatories and document requests on Sunrun. On
 7 March 13, 2025, Sunrun served its written objections and responses to those requests. Thereafter,
 8 beginning on April 3, 2025, Sunrun has made two productions of documents responsive to Plaintiff’s
 9 discovery requests. Sunrun continues to review its documents for responsiveness and will make
 10 future document productions, if any, before the discovery end date. Sunrun and Plaintiff are in the
 11 process of meeting and conferring with respect to Sunrun’s discovery responses, and to discuss the
 12 perceived deficiencies. Plaintiff intends to depose Sunrun’s 30(b)(6) representative and will work
 13 to find a mutually agreeable deposition date.

14 **B. Discovery Propounded By Defendant**

15 On May 2, 2025, Sunrun propounded interrogatories and requests for production of
 16 documents on Plaintiff. Plaintiff served her written objections and responses on June 26, 2025.
 17 Sunrun and Plaintiff are in the process of meeting and conferring with respect to Plaintiff’s discovery
 18 responses, and to discuss the perceived deficiencies. Sunrun intends to depose Plaintiff and will
 19 work to find a mutually agreeable deposition date.

20 **II. Other Issues Requiring This Court’s Attention**

21 None at this time, but Sunrun may file a motion to compel if the Parties cannot come to a
 22 resolution with respect to Plaintiff’s discovery responses.

23
 24 Dated: August 15, 2025

Respectfully submitted,

25 /s/ Glenn T. Graham

26 Glenn T. Graham (SBN # 338995)

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13 *Attorneys for Plaintiff Peggy Banks*

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16 **ATTESTATION**

17 I, Glenn T. Graham, am the ECF user whose identification and password are being used to
18 file this document. I hereby attest that all other signatories listed and on whose behalf the filing is
19 submitted, concur in the filing's content and have authorized the filing.

20 Dated: August 15, 2025

21 /s/ Glenn T. Graham
Glenn T. Graham

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